

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.
Demetrius Willis

Case: 2:21-mj-30530
Case No. Judge: Unassigned,
Filed: 11-09-2021
USA v. DEMETRIUS WILLIS (CMP)
(MLW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 26, 2021 in the county of Washtenaw in the
Eastern District of Michigan, the defendant(s) violated:

Code Section
18 U.S.C. § 922(g)(1)

Offense Description
Possession of a firearm by a convicted felon

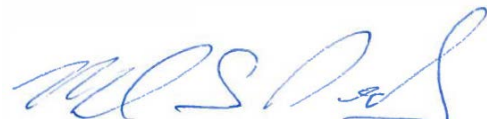
This criminal complaint is based on these facts:
see attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: November 9, 2021

City and state: Detroit, Michigan



Complainant's signature

Michael S. Parsons, Special Agent (ATF)
Printed name and title



Judge's signature

Hon. Anthony P. Patti, United States Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Michael S. Parsons, being duly sworn, do hereby state the following:

I. INTRODUCTION

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). I have been a Special Agent since September of 2000. I have been involved in numerous investigations regarding firearms, firearms licensing, and narcotic laws resulting in successful federal prosecutions.

2. The statements contained in this affidavit are based on my personal knowledge, my review of written police reports by the Washtenaw County Sheriff's Office (WCSO), and information provided to me by and/or through other law enforcement agents, investigators, and individuals with knowledge of this matter. This affidavit does not provide all the information known to law enforcement about this investigation. This affidavit provides information necessary to establish probable cause that Demetrius WILLIS (XX/XX/1982) has violated 18 U.S.C. § 922(g)(1) – Possession of a Firearm by a Convicted Felon.

II. PROBABLE CAUSE

3. On July 26, 2021, at approximately 01:08 am, WCSO Deputies assigned to road patrol witnessed a silver Ford Escape, with license plate number XXXXX59, traveling westbound on Clark Road with no taillights. Deputies stopped the silver Escape at Ford Boulevard and Clark Road, Ypsilanti Charter Township, Michigan. Deputy Howard approached the driver's side of the vehicle; Deputy Bland approached the passenger side of the vehicle. As Deputy Howard was advising the driver of the reason for the stop, Deputy Bland observed the grip of a handgun protruding from the waistband of the passenger DEMETRIUS WILLIS. Both occupants were placed into custody without incident.

4. Deputies recovered a 9mm caliber, Springfield Armory Model XD's pistol from WILLIS's front waistband. Under the driver's seat, deputies located a .45 caliber, Springfield Armory Model XD's pistol.

5. Demetrius WILLIS gave Deputies a false name and had to be positively identified through fingerprint scan at the WCSO Jail. After given his *Miranda* Rights, Deputy Bland asked WILLIS about the

second firearm recovered from the vehicle, WILLIS stated “No, I just know what I have on my hip... I don’t know what’s in the car cause it’s not my car”.

6. A criminal history check was conducted on WILLIS, which revealed that he is currently on Parole and that he has been convicted of the following felonies:

- a. 2001 – Retail Fraud – First Degree – 3rd Circuit Court.
- b. 2002 – Armed Robbery - 3rd Circuit Court.
- c. 2002 – Weapons Felony Firearm - 3rd Circuit Court.
- d. 2005 – Prisons – Prisoner Possessing Weapons – 50th Circuit Court.
- e. 2015 – Police Officer Assaulting/Resisting/Obstructing – 22nd Circuit Court.
- f. 2015 – Witness – Bribing/Intimidating/Interfering – 22nd Circuit Court.

7. On October 25, 2021, I received WILLIS’s Michigan Department of Corrections (MDOC) Prisoner Pre-Release Notice that was signed and dated by him on June 10, 2019. Within this notice, WILLIS acknowledges that he is a convicted felon and therefore prohibited from “use, brandish, display, carry or otherwise possess a firearm...”


8. I am an expert in the Interstate Nexus of Firearms. The Springfield Armory Model XDs, 9mm caliber pistol, recovered from

WILLIS, was manufactured outside the State of Michigan, thereby travelling in interstate commerce.

III. CONCLUSION

9. Probable cause exists that Demetrius WILLIS, in Ypsilanti Charter Township in the Eastern District of Michigan, knowingly possessed the above-described firearm: said firearm having traveled in interstate commerce; in violation of 18 U.S.C. § 922(g)(1).

Respectfully submitted,



Michael S. Parsons, Special Agent
Bureau of Alcohol, Tobacco, Firearms
and Explosives

Sworn to before me and signed in my
presence and/or by reliable electronic means.



HON. ANTHONY P. PATTI
UNITED STATES MAGISTRATE JUDGE

Date: November 9, 2021